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U.S. Department of Justice

United States Attorney
Southern District of New York

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July 30, 2008

BY FACSIMILE: (212) 805-6326

The Honorable Colleen McMahon
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Mutholib Sanni and Francia Tabares
07 Cr. 999 (CM)

Dear Judge McMahon:

The Government respectfully submits this letter, after speaking with Your Honor's Deputy, to request jointly with the defense an adjournment of the pre-trial conference currently scheduled for August 1, 2008, to September 19, 2008, at 9:30 a.m..

The Government also respectfully requests that time be excluded for purposes of the Speedy Trial Act from August 1 through the new conference date. The Government makes this request, with the consent of defense counsel, for the Government and the defense to continue to pursue discussions regarding a possible disposition before trial.

Respectfully submitted,

MICHAEL J. GARCIA
United States Attorney

By:

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cc: Roy Kulcsar, Esq., counsel for Francia Tabares (fax: 201-439-1478)
John M. Murphy, Jr., Esq., counsel for Mutholib Sanni (fax: 718-448-8685)